

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.4:20 CR 380-AGF
)	
ELLIS CARROLL BROWN, III,)	
)	
Defendant.)	

DEFENDANT'S PRELIMINARY EXHIBIT LIST

COMES NOW Defendant, Ellis Carroll Brown III, by and through his counsel,
James P. Towey, Jr., and provides notice of his intention to offer the following exhibits at
trial in the above-captioned matter:

1. St. Louis University Discharge Summary
2. John Bernsen – 302
3. Chief Aaron Jimenez – 302
4. Daniel Mudd – 302
5. Benjamin Freet – 302
6. From Real STL News April 11
7. Brian Hayes – 302
8. Hillsdale Reports
9. Interview of Ellis Brown – 10302019 Transcript
10. Kolb Victim – 302
11. Patrick Martin Incident Report
12. Brandon Means – 302
13. Edward Napier – 302
14. Patrick Martin – 302
15. Sgt. Robert Inman – 302

16. Sgt. Rob Scott – 302
17. St. Louis Metropolitan Police Department
18. St. Louis University Hospital – 302
19. St. Ann Police Department Use of Force Policy
20. St. Ann Police Department Calls for Service
21. St. Ann Police Report 19-00428
22. St. Ann Police Report 19-00427
23. Steven Kolb – SSM Health St. Louis University Hospital Admission Record
24. US Bank ATM Video
25. All St. Ann Dispatch Audio
26. All St. Ann Dash Cam Video
27. Patrick Martin – All Views
28. Benjamin Freet – All Views
29. Daniel Mudd – All Views
30. St. Ann Cad Notes
31. Steven Kolb Booking Photo
32. Ellis Brown Shoes
33. Photos of Kolb's Car After Accident

Should the defendant elect to utilize additional exhibits, they shall be disclosed as soon as practicable.

Respectfully submitted,

/s/ James P. Towey, Jr.
JAMES P. TOWEY, JR. #35351
Attorney for Defendant
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Town and Country, MO 63017
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CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Sirena Miller Wissler and Derek Wiseman, Assistant United States Attorneys.

/s/ James P. Towey, Jr.